

ERRATUM REDACTED FOR PUBLIC INSPECTION

Austin, TX 5929 Balcones Drive, Suite 200 Austin, TX 78731-4280 Phone: 512.343.2544

Fax: 512.343.0119

VIA ECFS

November 10, 2014

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, S.W. Washington, D.C. 20554

RE:

Connect America Fund, WC Docket No. 10-90; Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42 - Correction to FCC Form 481 - Brazos Telephone Cooperative, Inc.

Dear Ms. Dortch:

Brazos Telephone Cooperative, Inc., (the Cooperative) Study Area Code 442065, revised an error on its FCC Form 481 (Line 600 - Functionality in Emergency Situations) reported in the FCC Form 481, filed at the Commission on July 1, 2014. The Cooperative is enclosing the cover letter and the FCC Form 481 previously filed at the FCC in accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422.

The corrected FCC Form 481 has also been refiled with the USAC and the Public Utility Commission of Texas.

Please contact me if you have any questions.

Sincerely,

Deborah K. Morgan

Authorized Representative for Brazos Telephone Cooperative, Inc.

DKM/pfi

Enclosure

cc: Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau,

Mr. Lonnie Rue, Brazos Telephone Cooperative, Inc. Mr. Ted Scobee, Brazos Telephone Cooperative, Inc.



5929 Balcones Drive, Suite 200 Austin, TX 78731-4280 Phone: 512.343.2544 Fax: 512.343.0119

REDACTED - FOR PUBLIC INSPECTION

VIA ECFS

July 1, 2014

Ms. Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, S.W. Washington, D.C. 20554

RE: REQUEST FOR CONFIDENTIAL TREATMENT - Connect America Fund, WC Docket No. 10-90; Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42

Request that Information Submitted to the Commission be Withheld from Public Inspection Pursuant to 47 C.F.R. §0.459 and 5 U.S.C. §552(b)(4): Five-Year Service Quality Improvement Plan included in FCC Form 481

Confidential Financial Information – Subject to Protective Order in WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Before the Federal Communications Commission

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Brazos Telephone Cooperative, Inc. (the Cooperative), Study Area Code 442041, is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket Nos. 10-90 and 11-42. The Cooperative, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan and (2) the financial annual report, both of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan is being made pursuant to section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential treatment of the financial annual report is being made pursuant to the FCC's November 16, 2012 *Protective Order* in WC Docket No. 10-90 et al. These attachments contain competitively sensitive data that Brazos Telephone Cooperative, Inc. maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Cooperative.



Ms. Marlene Dortch July 1, 2014 Page 2

Five-Year Service Quality Improvement Plan

Pursuant to section 0.459 of the Commission's rules and Exemption 4 of FOIA, Brazos Telephone Cooperative, Inc. requests that the text and data extracted from its five-year service quality improvement plan be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Cooperative keeps confidential. Public availability of this information would have a substantial negative impact on the Cooperative.

In accordance with section 0.459 of the Commission's rules, the following information is provided in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan. Specifically, confidential treatment is sought for all information in the five-year plan related to the Cooperative's access line counts, existing broadband capabilities, and its network investment plans through 2019 that will improve service quality for its customers.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket Nos. 10-90 and 11-42 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a five-year service quality improvement plan, pursuant to 47 C.F.R. §§54.202(a)(1)(ii) and 54.313(a)(1).

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan contains granular information on the Cooperative's access line counts and existing broadband capabilities as well as detailed plans for financial investments in its network through 2019 to improve service to subscribers. This is closely guarded, privileged information that the Cooperative does not make publicly available.

(4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more wireless Internet service providers. Most RLECs also face competition from at least one other wireline broadband provider such as a larger cable company, who will typically seek to "cherry pick" the lower cost portions of the study area. In addition, all RLECs face competition throughout their territories from satellite broadband providers.



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(5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan would provide competitors with detailed, granular information regarding the Cooperative's access line count, its existing broadband capabilities, and its strategic plans for network investments. This would give competitors invaluable confidential information with which to develop their own strategies for investing in the service area, thereby bringing substantial competitive harm to the Cooperative.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Cooperative has continually treated the extracted information in its five-year plan as confidential and carefully controls the information to protect it from competitors. Access to the information is limited to employees that require it and to non-employees with confidentiality obligations such as lenders, consultants, auditors, and attorneys. In addition, when such information is required to be submitted to a state regulatory authority it has been filed as confidential information, not available to the public.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan is not available to the public, and third party access is limited as described in (6) above.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Cooperative requests that the extracted information be withheld from public inspection indefinitely. Although the information reflects the Cooperative's service improvement plans for a five year period, it would provide a very useful baseline for competitors for several years beyond that period.

(9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

Financial Annual Report

Section 3005 of FCC Form 481 requires a privately-held rate-of-return carrier receiving high cost support to attach a full and complete annual report of the Cooperative's financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). Brazos Telephone Cooperative, Inc. seeks confidential treatment of its financial annual report pursuant to the November 16, 2012 *Protective Order* in WC Docket No. 10-90, et al.¹ The *Protective Order* specifically covers information filed pursuant to 47 C.F.R. §54.313(f)(2).

¹ Connect America Fund et al., WC Docket No. 10-90 et al., Protective Order, DA 12-1857 (rel. Nov. 16, 2012).



Ms. Marlene Dortch July 1, 2014 Page 4

Brazos Telephone Cooperative, Inc. is providing to the Office of the Secretary, under seal, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection.

Each page of the five-year service quality improvement plan confidential submission bears the legend, "CONFIDENTIAL - NOT FOR PUBLIC DISCLOSURE."

Each page of the financial annual report confidential submission bears the legend, "CONFIDENTIAL FINANCIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

Two copies of the Form 481 filing in redacted form and an accompanying cover letter are also being provided with the confidential filing. Each page of the redacted filing and accompanying cover letter is marked "REDACTED – FOR PUBLIC INSPECTION."

Two copies of this cover letter and the Form 481 filing with the confidential information are also being delivered to Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau.

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as an attachment to the FCC Form 481.

This cover letter includes no confidential information and the text is the same in both the non-redacted and redacted versions except for the confidentiality markings.

Please contact me if you have any questions.

Sincerely,

Deb Morgan

Authorized Representative for

Brazos Telephone Cooperative, Inc.

DM/pjf

Enclosures

cc: Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau, Federal Communications Commission, (2 hardcopies of non-redacted submission)

Mr. Lonnie Rue, Brazos Telephone Cooperative, Inc. Mr. Ted Scobee, Brazos Telephone Cooperative, Inc.

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<015>	Study Area Name	BRAZOS TEL COOP IN	re .			
<020>	Program Year	2015				
<030>	Contact Name: Person USAC should contact with questions about this data	Ted Scobee				
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9405647341 ext.				
<039>	Contact Email Address: Email of the person identified in data line <030>	tscobee@brazosnet.	com	TO SANCE WAY - 188		
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<1110	>		(complete attached work	sheet)		1.1.1.1.11
<1200	> Terms and Condition for Lifeline Customers		(complete attached work	sheet)		
	Price Cap Carriers, Proceed to Price Cap Additions					
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<010>	Study Area Code	442041		
<015>	Study Area Name	BRAZOS TEL C	OOP INC	
<020>	Program Year	2015		
<030>	Contact Name - Person USAC should contact regarding this data	Ted Scobee		
<035>	Contact Telephone Number - Number of person identified in data line <030>	9405647341 e	ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	tscobee@braz	osnet.com	
<110>	Has your company received its ETC certification from the FCC?	(yes	/no) O O	
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes	(/no) O O	
<112>	If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service. Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your of CETC which only receives frozen support, your progress report is only required to address voice telephony service.	ompany is a	442041tx112.pdf	
	Please check these boxes below to confirm that the attached documents(s), on lit 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	ne		Name of Attached Document
<113>	Maps detailing progress towards meeting plan targets			
<114>	Report how much universal service (USF) support was received			
<115>	How (USF) was used to improve service quality			
116>	How (USF)was used to improve service coverage			
117>	How (USF) was used to improve service capacity			
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.			

(200) Service Outage Reporting (Voice) Data Collection Form

<220>

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	442041
<015>	Study Area Name	BRAZOS TEL COOP INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Ted Scobee
<035>	Contact Telephone Number - Number of person identified in data line <030>	9405647341 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tscobee@brazosnet.com

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NORS Reference Number	Outage Start Date	Outage Start Time	Outage End Date		Number of Customers Affected	Total Number of Customers	911 Facilities Affected (Yes / No)	Service Outage Description (Check all that apply)	Did This Outage Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventative Procedures
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<030>	Contact Name - Person USAC should contact regarding this data	Ted Scobee
<035>	Contact Telephone Number - Number of person identified in data line <030>	9405647341 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tscobee@brazosnet.com
<701> <702>	Residential Local Service Charge Effective Date 1/1/2014 Single State-wide Residential Local Service Charge	

<703>

				Residential Local	<585		Mandatory Extended Area	
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fe
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<030>	Contact Name - Person USAC should contact regarding this data	Ted Scobee
<035>	Contact Telephone Number - Number of person identified in data line <030>	9405647341 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tscobee@brazosnet.com

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State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken Wher Limit Reached (selec
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<039>	Contact Email Address - Email Address of person Identified in data line <030>	tscobee@braz	osnet.com	
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<035>	Contact Telephone Number - Number of person identified in data line		9405647341 ext.
<039>	Contact Email Address - Email Address of person identified in data line	<030>	tscobee@brazosnet.com
<910>	Tribal Land(s) on which ETC Serves		
<920>	Tribal Government Engagement Obligation		Name of Attached Document
If your c	ompany serves Tribal lands, please select (Yes,No, NA) for each these boxes		
to confi	rm the status described on the attached document(s), on line 920,		All Control of the Co
demons	trates coordination with the Tribal government pursuant to	Sele	
§ 54.313	3(a)(9) includes:	(Yes,	
<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	NA NA	
<922>	Feasibility and sustainability planning;		
<923>	Marketing services in a culturally sensitive manner;		
<924>	Compliance with Rights of way processes		
<925>	Compliance with Land Use permitting requirements		
<926>	Compliance with Facilities Siting rules		No. of the Control of
<927>	Compliance with Environmental Review processes		
<928>	Compliance with Cultural Preservation review processes		
<929>	Compliance with Tribal Business and Licensing requirements.		

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<010>	Study Area Code	442041
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<035>	Contact Telephone Number - Number of person identified in data line <030>	9405647341 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tscobee@brazosnet.com
<1120>	Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)	
<1130>	Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)	

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<030>	Contact Name - Person USAC should contact regarding this data	Ted Scobee
<035>	Contact Telephone Number - Number of person identified in data line <030>	9405647341 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tscobee@brazosnet.com
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	Name of Attached Document
<1220>	Link to Public Website HTTP ww	w.brazosnet.com/telephone
or the we	neck these boxes below to confirm that the attached document(s), on line 1210, bsite listed, on line 1220, contains the required information pursuant to (a)(2) annual reporting for ETCs receiving low-income support, carriers must report:	
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	
<1222>	Details on the number of minutes provided as part of the plan,	
<1223>	Additional charges for toll calls, and rates for each such plan.	

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<035>	Contact Telephone Number - Number of person identified in data line <030>	9405647341 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tscobee@brazosnat.com
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CHECK th		rica Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II
	support as set forth in 47 CFR § 54.313(b),(c),(d),((e) the information reported on this form and in the documents attached below is accurate.
2222	Incremental Connect America Phase I reporting	
<2010>	2nd Year Certification (47 CFR § 54.313(b)(1))	=
<2011>	3rd Year Certification (47 CFR § 54.313(b)(2))	
	Pole Con Continue Parallel Continue Continue Continue (AT CER & EA 212(a))	
-2042	Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))	
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<2014>	2015 Frozen Support Certification	
<2015>	2016 and future Frozen Support Certification	
	Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))	8
<2016>	Certification Support Used to Build Broadband	
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	Connect America Phase II Reporting (47 CFR § 54.313(e))	
<2017>	3rd year Broadband Service Certification	· H
<2018>	5th year Broadband Service Certification	
<2019>	Interim Progress Certification	
	Diagra shock the how to confirm that the attached document(s) on	line 2021, contains the required information
<2020>	nursuant to 6.54.313 (a)(3)(ii) as a recipient of CAF Phase II support	t shall provide the number, names, and
	addresses of community anchor institutions to which began providing	ing access to broadband service in the
	preceding calendar year.	
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<2021>	Interim Progress Community Anchor Institutions	1
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		Name of Attached Document Listing Required Information

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<035>	Contact Telephone Number - Number of person identified in data line <030>	9405647341 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tscobee@brazosnet.com
CHECK 1		t to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 e information reported on this form and in the documents attached below is accurate.
(3010)	Progress Report on 5 Year Plan	
	Milestone Certification (47 CFR § 54.313(f)(1)(i))	
		Name of Attached Document Listing Required Information
(3011)	Please check this box to confirm that the attached document(s), on line 3 § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addreproviding access to broadband service in the preceding calendar year.	012 contains the required information pursuant to sses of community anchor institutions to which began
		1
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))	
		Name of Attached Document Listing Required Information
		(Yes/No)
(3013)	Is your company a Privately Held ROR Carrier [47 CFR § 54.313(f)[2]] If yes, does your company file the RUS annual report	(Yes/No)
100 V. V. V. S. V. W.	5 1 March 2 1 March 2	contains the required information pursuant to § 54.313(f)(2) compliance requires:
		, contains the required knowlescon paradatic to g 5-1.5 (5)()(2) demphasion required
(3015)	Electronic copy of their annual RU5 reports (Operating Report for Telecommunications Borrowers)	"L_J
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Car	sh Flows
	SOCIA- CONTINUE AND	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	
		Name of Attached Document Listing Required Information
(2018)	16 ab New 2014 In volte organization 2	(Yes/No)
(3018)	if the response is no on line 3014, is your company audited?	
	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains	
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a fo	rmat comparable to RUS Operating Report for Telecommunications
A-3533		[7]
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Ca	
(3021)	Management letter issued by the independent certified public accountant that p	performed the company's financial audit.
	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:	
(3022)	Copy of their financial statement which has been subject to review by an	
(ander)	independent certified public accountant; or 2) a financial report in a	
	format comparable to RUS Operating Report for Telecommunications	
(nonn)	Borrowers,	
(3023)	Underlying information subjected to a review by an independent certified public accountant	=
(3024)	Underlying information subjected to an officer certification.	
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Car	
		42041tx3026.pdf
(3026)	Attach the worksheet listing required information	
(serve)		
	I.	
		Name of Attached Document Listing Required Information

	gion, Reporting Cargier. Betion Eprin	पुरत्यकृता की। OMB controller sectione (and Soutcoller 2005) 1846 Индига
<010>	Study Area Code	442041
<015>	Study Area Name	BRAZOS TEL COOP INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Ted Scobee
<035>	Contact Telephone Number - Number of person identified in data line <030>	9405647341 ext.
<039>	Contact Fmail Address - Email Address of person identified in data line <030>	tscobse@brazosnet.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. Name of Reporting Carrier: Signature of Authorized Officer: Date Printed name of Authorized Officer: Title or position of Authorized Officer: Telephone number of Authorized Officer: Filing Due Date for this form: Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

Gentification = ArchiviConnect : FCC Surplies : District Connection of the Connecti

<010>	Study Area Code	442041
<015>	Study Area Name	BRAZOS TEL COOP INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Ted Scobee
<035>	Contact Telephone Number - Number of person identified in data line <030>	9405647341 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tscobee@brazosnet.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier certify that (Name of Agent) Deb Morgan is authorized to submit the information reported on behalf of the reporting carrier. also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate. Name of Authorized Agent: Deb Morgan Name of Reporting Carrier: BRAZOS TEL COOP INC Signature of Authorized Officer: CERTIFIED ONLINE Date: 11/06/2014 Printed name of Authorized Officer: Lonnie Rue Title or position of Authorized Officer: CEO Telephone number of Authorized Officer: 9405645659 ext .7340 Study Area Code of Reporting Carrier: 442041 Filing Due Date for this form: 07/01/2014 Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier l, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate. BRAZOS TEL COOP INC Name of Reporting Carrier: Name of Authorized Agent or Employee of Agent: Deb Morgan Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE Date: 11/06/2014 Printed name of Authorized Agent or Employee of Agent: Deb Morgan Title or position of Authorized Agent or Employee of Agent Manager Business Compliance Telephone number of Authorized Agent or Employee of Agent: 5126527705 ext. Study Area Code of Reporting Carrier: 442041 Filing Due Date for this form: 07/01/2014 Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.



	ce Offerings Including Voice Rate Data lection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	442911	
<015>	Study Area Name	BPAZOS TEL COOP INC	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data	Ted Societ	
<035>	Contact Telephone Number - Number of person identified in data line <030>	9405447341 exr.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	tachbee brazhenet com	
<701>	Residential Local Service Charge Effective Date 1/1/2014		

<703>

<702> Single State-wide Residential Local Service Charge

<a1></a1>	<a2></a2>	<a3></a3>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<b5></b5>	<0
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fee
7 X	Archer City		FH	14 23	0,0	C 68	4 1	19.51
IX	Bryson		FF	14 25	0.6	0.46	3.5	18.39
TX	Elbert		FF	14.08	0.0	0.65	3.5	18.23
צד	Eliasville		FR	14.08	0 0	0.55	3.5	18.23
273	Jermyn		FR	11.23	0.0	1. 56	3 5	18,39
TR	Loving		P'R	14.08	0.0	1 55	3.5	18.23
TX	Newcastle		FR	14.23	0.0	D. v6	3.5	16.39
rx	Olney		PE	11.95	U.O	2 59	υ. n	16.54
'TX	Orth		FR	14.08	n n	6.5	3.5	16.23
TX	Woodson		FR	14.00	0.0	0.65	3.5	15 23
								<u> </u>
								
								
			-170					
						1	**************************************	

(710) Broadband Price Offerings Data Collection Form

FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	442041
<015>	Study Area Name	BRAZUS TEL COOP INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Ted Stobey
<035>	Contact Telephone Number - Number of person identified in data line <030>	9405647543 ca:
<039>	Contact Email Address - Email Address of person identified in data line <030>	Tisciphed Thrandishet.com

<a1></a1>	<a2></a2>	<b1></b1>	<b2></b2>	<c> <d1></d1></c>	<d2:< th=""><th>> <d3></d3></th><th>_</th><th><d4></d4></th></d2:<>	> <d3></d3>	_	<d4></d4>
State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees		Broadband Service -Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select)
TX	All	59.95	0.0	59.95	÷ 0	2.0	r u	Other, No limit on usage allowers
TX	Ali	79.55	5,0	79 95	ių v	2.0	2.2	Other, No simit on usage allowan
TX	All	149.95	o.0	149 95	30 0	3, c	o u	Other, Un linds on usage allowand
TX.	A11	205 95	0.0	209.95	50.0	5.0	c u	Other, No limit on usage allowan
		 						
	 	 						
	<u> </u>	 						

						1		

LINE 112 - FIVE-YEAR SERVICE QUALITY IMPROVEMENT PLAN

Following is the initial five-year service quality improvement plan for Valliant Telephone Company, Inc. ("Valliant" or "the Company") pursuant to 47 C.F.R. § 54.202(a)(1)(ii) that requires an eligible telecommunications carrier (ETC) to describe proposed improvements or upgrades to the ETC's network throughout its service area. The USF/ICC Transformation Order establishes a public interest obligation for rate-of-return ETCs to provide broadband service at speeds of at least 4 Mbps downstream and 1 Mbps upstream (4:1) "upon reasonable request." A service quality improvement plan cannot project where in the service area reasonable requests will be made. However, the proposed network expenditures in this plan ensure the continuation of high-quality voice and broadband services within the Company's service territory.

Although this plan is a good faith effort by the Company, it is subject to change, given the uncertainty faced by ETCs regarding whether capital investments will be recoverable over the five year planning horizon. Factors that may affect the capital improvements plan include erosion of the customer base due to competition, alternative technologies, economic conditions in the service area, and unpredictable changes in the universal service support amounts an ETC receives.

Valliant owns and operates three exchanges serving subscribers in the southeastern Oklahoma. The service area includes portions of Chocktaw, McCurtain, and Pushmataha counties. The Company's service area covers approximately 222 square miles.

Baseline Network Description



Table 1 - Current Broadband Capabilities

Exchange Name	Total Square Miles	Total Existing Access Lines	Estimated Total Population Served	Broadband Capable Lines	Estimated Broadband Capable Population	% Broadband Capable

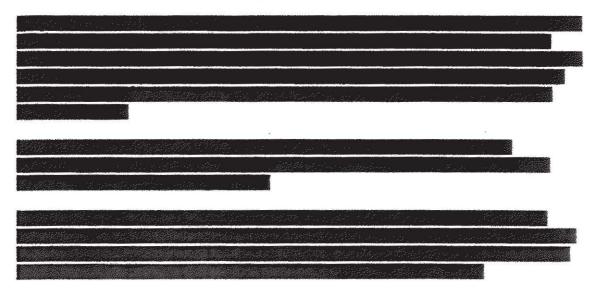
2014 - 2019 Service Quality Improvement Plan

Table 2 provides Valliant's intended service quality improvements and associated capital expenditures for 2014 – 2019, by exchange, along with estimates of the population that will be served by the improvements.

Table 2 - Service Quality Improvement Plan

Exchange	Description of Improvement	2014	2015	2016	2017	2018	2019	Estimated Population Served by Improvements

Narrative Description: 2014 - 2019



LINE 510 - SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES COMPLIANCE

Brazos Telephone Cooperative, Inc. complies with applicable service quality standards and consumer protection rules as required by the state regulatory commission and the Federal Communications Commission.

The rates, terms, and conditions under which the Cooperative operates are outlined in its Local Exchange Tariff, which is approved by the state commission. The Cooperative's tariff contains provisions regarding its customer service and protection practices, including resolving disputes with the Cooperative, applying for service, the classification of business and residential rates, deposits, billing and payment for service, refusal, disconnection and cancellation of service. The tariff is available for customer review in the Business Office, as requested. Rates and terms of service are disclosed to customers upon application for service both verbally and in writing as part of a packet of information for new customers. Rates, applications and certain terms of service are also available on the Cooperative's website.

Service quality standards are established by the state commission and the Cooperative consistently meets or exceeds the standards and provides reports to the state commission, in accordance with the state commission's rules.

The protection of customers' privacy and information is of utmost importance and the Cooperative has a policy and established operating procedures that comply with the FCC's Customer Proprietary Network Information (CPNI) rules (47 C.F.R. §§64.2001-64.2011). Certification of the Cooperative's compliance with CPNI rules and a description of the Cooperative's operating procedures that ensure compliance are filed at the FCC annually.

LINE 610 - ABILITY TO FUNCTION IN EMERGENCY SITUATIONS

Brazos Telephone Cooperative, Inc. is able to function in emergency situations. The Cooperative has a reasonable amount of back-up power to ensure functionality without an external power source. Standby power generators are supplied at the central office, remote switch sites, and repeater sites to ensure functionality without an external power source until power is restored. The network is capable of managing traffic spikes resulting from emergency situations.

The Cooperative is able to reroute traffic around damaged facilities. Although the Cooperative's ability to reroute traffic around damaged facilities is not absolute and may be limited in certain circumstances, there is a restoration plan in place for expeditious recovery of service, including splicing of damaged facilities when warranted.

LINE 1010 - VOICE SERVICES RATE COMPARABILITY

The Wireline Competition Bureau's most recent reasonable comparability benchmark for voice services is \$46.96, which includes the federal subscriber line charge ("SLC").1

In the exchanges served by Brazos Telephone Cooperative, Inc. ("the Cooperative"), the highest single-line residential local rate, including any mandatory extended area service charge, is \$22.43. When the federal SLC (\$6.50) and the state universal service fee (\$.83) are included, the rate becomes \$29.76. Therefore, the Cooperative's pricing of fixed voice services is less than the reasonable comparability benchmark of \$46.96.

¹ Wireline Competition Bureau Announces Results of Urban Rate Survey for Voice Services; Seeks Comment on Petition for Extension of Time to Comply With New Rate Floor, WC Docket No. 10-90, DA 14-384 (rel. Mar. 20, 2014), p. 2.



Independent Auditor's Report

The Board of Directors Brazos Telephone Cooperative, Inc. Olney, Texas

We have audited the accompanying consolidated financial statements of Brazos Telephone Cooperative, Inc., which comprise the balance sheets as of December 31, 2013 and 2012, and the related consolidated statements of operations, comprehensive income, changes in members' equity, and cash flows for the years then ended, and the related notes to the financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audits to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Brazos Telephone Cooperative, Inc. as of December 31, 2013 and 2012, and the results of its operations and its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Change in Accounting Principle

As discussed in Note 12 to the financial statements, management has elected to change its policy for accounting for the investment in cellular entities in 2013. Our opinion is not modified with respect to that matter.

Curtis Blakely + Co, P.C. Longview, Texas

April 4, 2014

BRAZOS TELEPHONE COOPERATIVE, INC. CONSOLIDATED BALANCE SHEETS December 31

Assets

Current Assets:

Cash and cash equivalents
Temporary investments
Accounts receivable
Accrued unbilled revenue
Materials and supplies
Prepaid income taxes
Other prepayments
Deferred income taxes

Total Current Assets

Property, Plant, and Equipment: Plant in service Plant under construction

Total Property, Plant, and Equipment

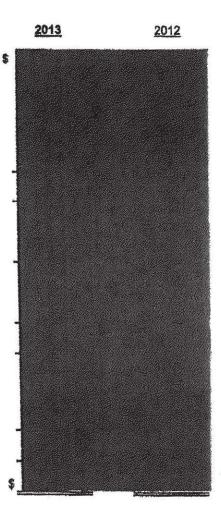
Less: Accumulated depreciation

Net Property, Plant, and Equipment

Investments and Other Assets: Investment in cellular entities Other Investments Deferred charges

Total Investments and Other Assets

Total Assets



BRAZOS TELEPHONE COOPERATIVE, INC. CONSOLIDATED BALANCE SHEETS December 31

Liabilities and Equities

Current Liabilities:

Current maturities of long-term debt
Accounts payable
Accrued income taxes
Accrued taxes
Accrued interest
Accrued compensated absences
Other accrued liabilities
Customer deposits

Total Current Liabilities

Long-Term Debt, Less Current Maturities: CoBank mortgage notes

Other Liabilities and Deferred Credits: Deferred income taxes Accrued postretirement benefits

Total Other Liabilities and Deferred Credits

Members' Equities:

Memberships
Patronage capital assigned
Patronage capital assignable
Accumulated other comprehensive income:
Unrecognized postretirement benefit costs

Total Equities

Total Liabilities and Equities



BRAZOS TELEPHONE COOPERATIVE, INC. CONSOLIDATED STATEMENTS OF OPERATIONS For the Years Ended December 31

Operating Revenues:

Local network services
Network access services
Long distance network services
Internet revenue
Miscellaneous
Less: Uncollectible recoveries (revenues)
Total Operating Revenues

Operating Expenses:

Plant specific operations
Plant nonspecific operations
Depreciation and amortization
Customer operations
Corporate operations
Long distance expenses
Internet expenses
Other operating expenses
Total Operating Expenses

Operating Taxes:

Income taxes
Other operating taxes
Total Operating Taxes

Operating Margin

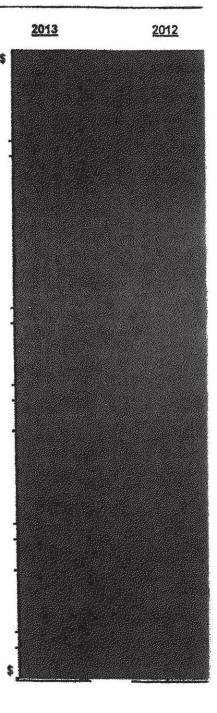
Nonoperating Margin:

Interest and dividend income Cellular entitles' distributions Other nonoperating expense Income taxes Total Nonoperating Margin

Margin Before Interest Charges

Interest Charges: Interest expense Capitalized interest Total Interest Charges

Net Wargin

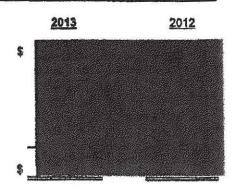


BRAZOS TELEPHONE COOPERATIVE, INC. CONSOLIDATED STATEMENTS OF COMPREHENSIVE INCOME For the Years Ended December 31

Not Margin

Other Comprehensive Income:
Postretirement health plan benefits:
Actuarial gain (loss) arising
Reclassification of prior year comprehensive income
amounts included in current year net income

Comprehensive Income



BRAZOS TELEPHONE COOPERATIVE, INC. CONSOLIDATED STATEMENTS OF CHANGES IN MEMBERS' EQUITY For the Years Ended December 31

	Memberships	Patronage Gapital Assignable	Patronage Capital Assigned	Accumulated Other Comprehensive Income	Total
Balance, January 1, 2012 as Previously Reported	\$		NAME OF THE OWNER O		
Prior Period Adjustment, Change In Accounting Principle					
Balance, January 1, 2012 as Restated					
Patronage Capital Assigned					
Net Margin					
Actuerial Gain (Loss) Arising					
Amounts Reclassified From Accumulated Other Comprehensive Income					
nemberships Refunded					
Retirements					
Balance, December 31, 2012					
Patronage Capital Assigned					
Net Margin					
Actuarial Gain (Loss) Arising					
Amounts Reclassified From Accumulated Other Comprehensive Income					
Hemberships Refunded					
Retirements					

Balance, December 31, 2013

BRAZOS TELEPHONE COOPERATIVE, INC. CONSOLIDATED STATEMENTS OF CASH FLOWS For the Years Ended December 31

Cash Flows from Operating Activities:

Net margin

Adjustments to reconcile net margin to net cash provided by operating activities:

Depreciation and amortization

Patronage capital certificates received

Loss on disposal of equipment

Change in assets and liabilities:

Accounts receivable

Prepaids and deferred charges

Deferred tax assets

Accounts payable and accruals

Deferred tax liabilities and deferred credits

Total Adjustments

Net Cash Provided by Operating Activities

Cash Flows from Investing Activities:

Capital expenditures

Proceeds from sales of assets

Change in temporary investments

Net Cash Provided by (Used in) Investing Activities

Cash Flows from Financing Activities:

Payments of long-term debt

Proceeds from cushion of credit

Memberships refunded

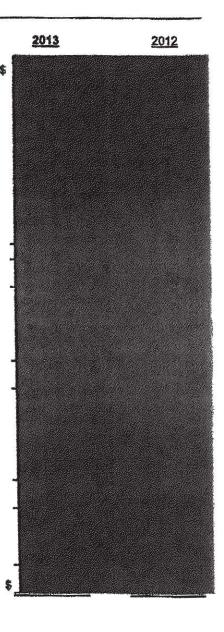
Patronage capital retired

Net Cash Used in Financing Activities

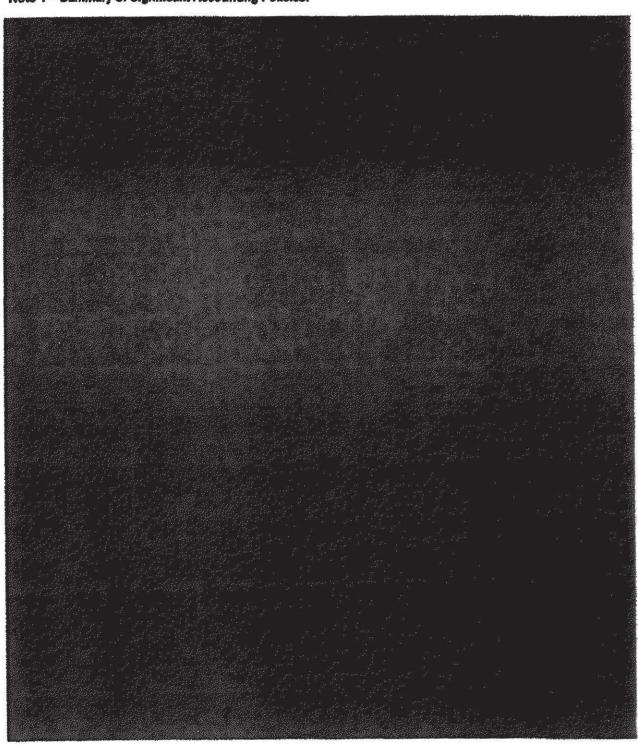
Net Increase in Cash and Cash Equivalents

Cash and Cash Equivalents at Beginning of Year

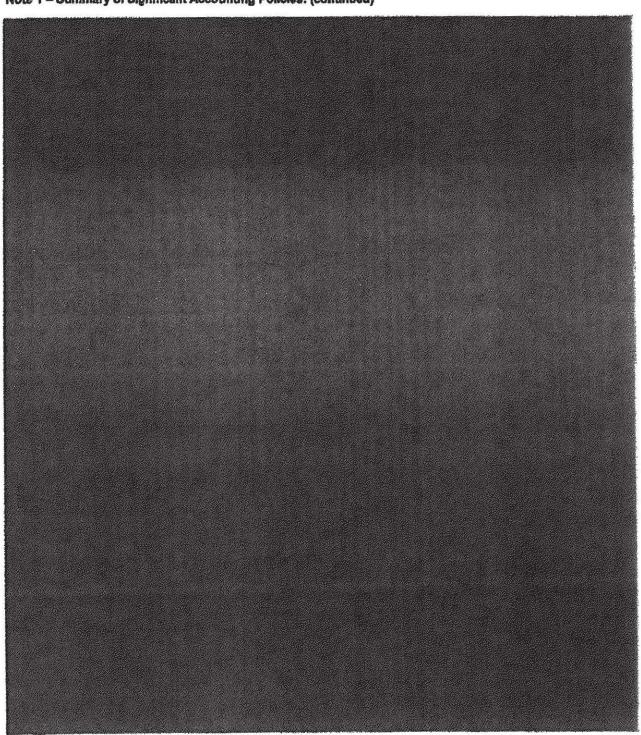
Cash and Cash Equivalents at End of Year



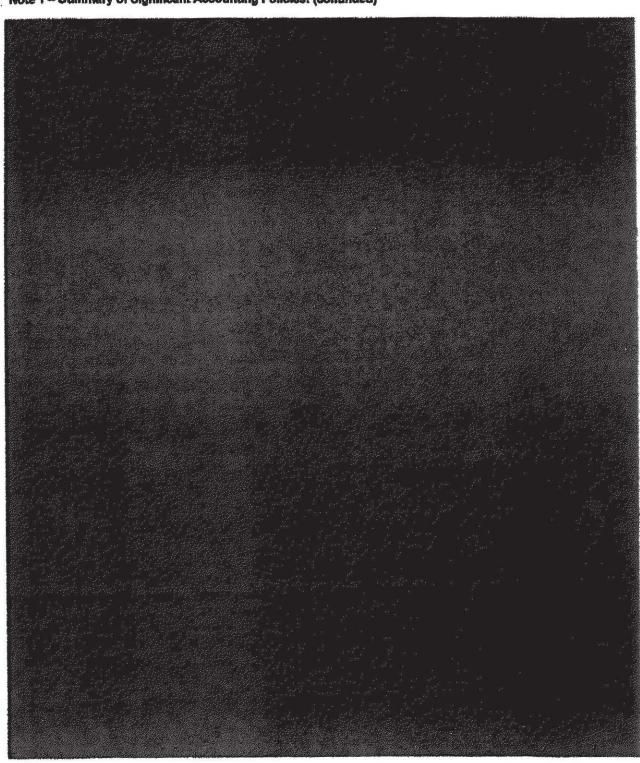
Note 1 - Summary of Significant Accounting Policies:

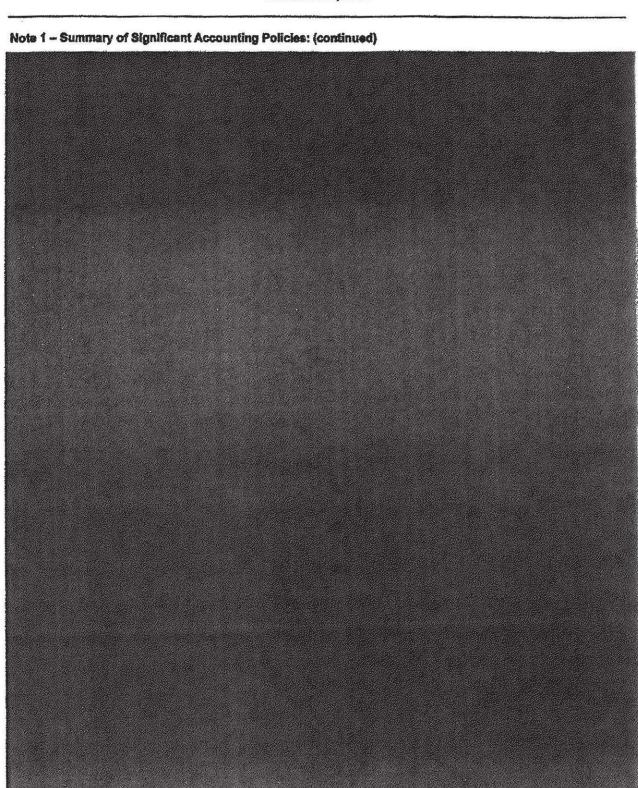


Note 1 - Summary of Significant Accounting Policies: (continued)



Note 1 - Summary of Significant Accounting Policies: (continued)



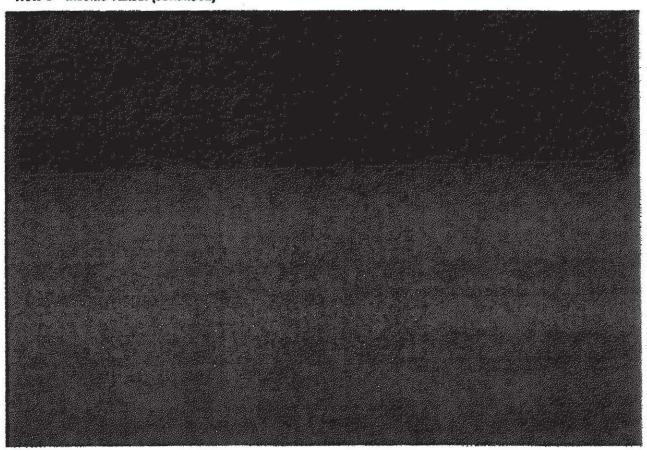


Note 1 – Summary of Significant Accounting Policies: (continued)	
Note 2 - Accrued Unbilled Revenue:	
Note 3 - Income Taxes:	40

2012

BRAZOS TELEPHONE COOPERATIVE, INC. NOTES TO CONSOLIDATED FINANCIAL STATEMENTS December 31, 2013





Note 5 - Investment in Cellular Entities:

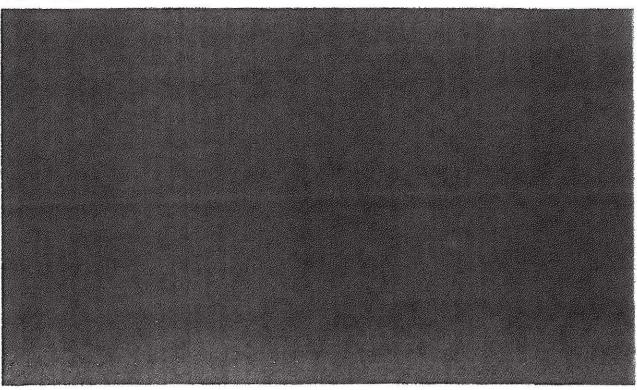


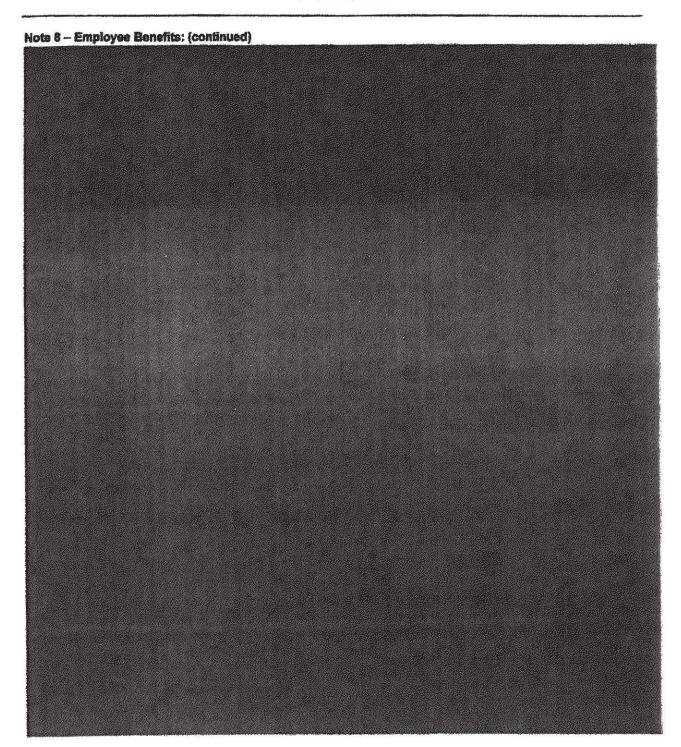
Note 6 - Other Investments:

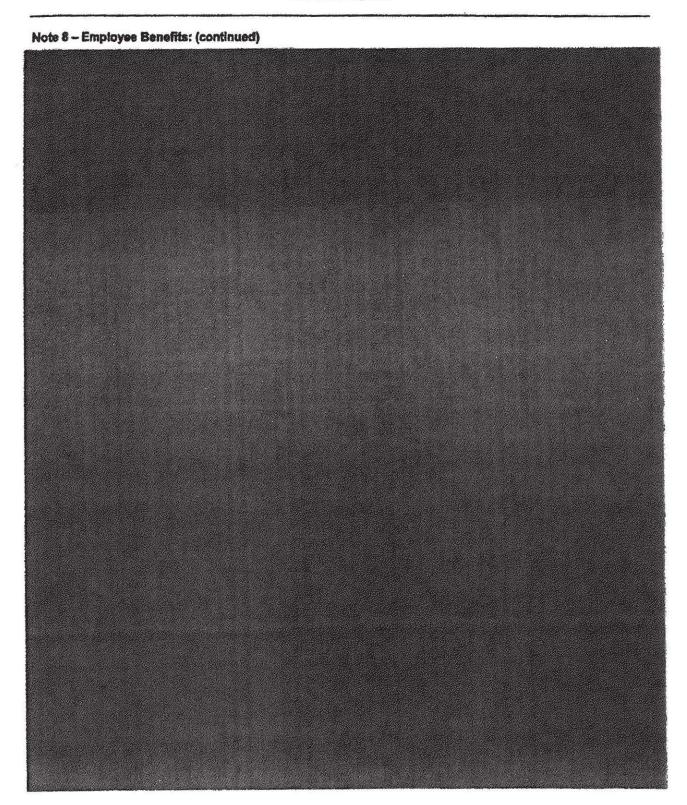
Other investments are stated at cost and contain the following:



Note 6 - Other investments: (continued)	
Note 7 - Long-Term Debt:	
Note 8 - Employee Benefits:	
Savings Plan	







Note 9 - Additional Cash Flow Information:	
Note 10 — Financial Instruments:	
Note the Commitments and Continuousless	
Note 11 – Commitments and Contingencies:	
	The second

Note 11 - Commitments and Contingencies: (continued)	
Note 12 - Change in Accounting Principle:	
Note 12 - Ghange in Accounting Finispie.	
Note 52 Peolegaification Out of Assureriated Other Communication Income	
Note 13 - Reclassification Out of Accumulated Other Comprehensive Income:	